

ARGUMENTS/REMARKS

Claims 1-18 are pending. Claims 1, 6-8, 13, and 18 have been amended. The amendments are supported by the application as filed, for example in paragraphs [0052]-[0054] and [0060]-[0061] of the published application. No new matter was added.

Applicants' attorney was unable to schedule an interview prior to filing this response. Applicants' attorney would like to schedule a telephone interview with the Examiner after this response is filed and will contact the Examiner to discuss this possibility.

Rejection under 35 U.S.C. § 101

Claim 9 was rejected under 35 U.S.C. § 101. The Office Action states:

Claim 9 is directed to a computer program product in a computer readable medium wherein the computer readable medium, according to paragraph 0082 of specification, also includes airwaves. Applicant has provided evident that Applicant intends the medium to include signals as such the claim is drawn to a form of energy. Energy is not one of the four categories

(Page 2, lines 14-17).

However, Applicants' attorney respectfully notes that claim 9 is a dependent claim that recites a home network. Thus, it is believed that the rejection under 35 U.S.C. § 101 was intended to apply to claim 1 rather than claim 9.

Accordingly, claim 1 has been amended to recite a "computer readable **storage** medium with a computer program **stored thereon**." It is believed that claim 1 as amended excludes the subject matter identified by the Examiner as nonstatutory (i.e. energy). Therefore, it is respectfully submitted that the rejection under 35 U.S.C. § 101 should be withdrawn.

Rejections under 35 U.S.C. § 103

Claims 1-4 and 6-18 were rejected under 35 U.S.C. § 103(a) as obvious in view of Webb et al., U.S. Patent Pub. No. 2002/0083342 (hereinafter "Webb") and Saito, U.S. Patent No. 7,218,643 (hereinafter "Saito"). Claim 5 was rejected under 35 U.S.C. § 103(a) as obvious in view of Webb, Saito, and Min et al., U.S. Patent Pub. No. 2006/0037036 (hereinafter "Min").

It is respectfully submitted that the claims are not obvious for at least the following reasons. By way of example, claim 6 is directed to a gateway. Claim 6 has been amended to recite, in pertinent part:

at least one processor configured to:

verify that the remote user is an authorized user of the home network;

generate a network address translation rule associating the Internet protocol address with the second port;

dynamically generate a Web page, the Web page including links to content on one or more devices on the home network, the content accessible to the gateway via a content protocol, the Web page allowing the remote user to select only content or services that the remote user is authorized to select;

transmit the Web page to the remote user;

receive a selection request from the remote user;

receive content from the network device using a content protocol and without accessing a Web server; and

provide content or services to the remote user from the network device attached to the second port according to the selection request.

(Emphasis added.)

Requiring each device in a home network to include a Web server in order to share content would present problems for a user of a home network, as noted in the present application, for example in paragraphs [0006]-[0009]. Because of these drawbacks of the prior art, some implementations described in the present application allow a device in a home network to share content without requiring the device to run a Web server. Thus, in some embodiments described in the present application, one or more devices on the home network, such as a gateway, may be configured to “dynamically generate a Web page, the Web page including links to content on one or more devices on the home network, the content accessible to the gateway via a content protocol, the Web page allowing the remote user to select only content or services that the remote user is authorized to select,” as recited in claim 6 as amended. Examples of such Web pages are illustrated in the application as filed, for example in Figures 2B-2D. In this way, a user

may be presented with a Web page that includes links to content on the network without requiring that the devices hosting the content each have an on-board Web server.

Webb describes a system in which a network gateway controls access to various “smart” devices having “on-board Web servers.” (§ [0004]-[0007]). According to Webb, “A Web server (also referred to as an HTTP server) is a computer program that utilizes HTTP to serve files that form Web pages to requesting Web clients.” (§ [0030]). Thus, the techniques described in Webb require that “Each of the devices connected to the private network 16 includes an on-board Web server that allows a user to perform various configuration, trouble-shooting, and/or administrative functions with respect to the device.” (§ [0043]).

In contrast, claim 6 as amended recites a gateway configured to generate a Web page that includes links to content on other devices, content which is accessible to the gateway via a content protocol. Thus, because each device in Webb includes an on-board Web server, Webb does not disclose or suggest generating the type of Web page recited in claim 6.

Webb does mention serving a Web page to the user’s client. For example, Webb states:

[0049] The Web page served to the user's client preferably includes a **link** (which may comprise text and/or graphics) **to the Web server** of each device on the private network for which the user has access rights. Each link includes a URL for the gateway that is valid on the public network and an identification of a gateway port that is mapped to the Web server of a respective device. Thus, when activated by the user, a link directs a client request to access a respective device Web server via a specific port of the gateway. For example, referring back to FIG. 2, a link to the Web server for the smart appliance 18 of FIG. 1 (having an IP address of 192.168.0.3:80) is directed to port 1000 of the gateway 14 of FIG. 1 (IP address 12.24.3.253).

(Emphasis Added).

However, the Web page described in paragraph [0049] of Webb includes *links to Web servers* on devices the home network, not links to the actual content on such devices. A link to a Web server that independently serves content, as described in Webb, is different from a link to the actual content, as recited in the claims, since a link to a Web server on a device requires that the device run a Web server. Thus, according to the techniques described in Webb, each of the devices linked to on the Web page described in paragraph [0049] must be running a Web server.

In contrast, the Web page recited in claim 6 includes links to content accessible to the gateway via a content protocol. In this way, a user may access content that may not be accessible via a Web server. Moreover, such content may be accessed without requiring each device on a private network to include an on-board Web server, as required by Webb.

Webb also mentions serving a “scrubbed” Web page to a user. For example, Webb states:

[0051] Referring back to FIG. 4, upon receiving a user request to access a device Web server in response to user activation of a link on the Web page, a gateway redirects the received client request to the respective device Web server (Block 250). **The gateway scrubs a Web page served by a Web server in response to a client request** to remove any links to Web servers of devices for which the user does not have access rights (Block 260), and to modify and/or “remap” a uniform resource locator (URL) containing an address not valid on the public network with an address that is valid on the public network (Block 270). For example, a link within a Web page served by a device Web server may contain a URL having an IP address within the domain of the private network which may not be valid on the public network. According to embodiments of the present invention, the gateway replaces the IP address that is valid only on the private network with the gateway IP address and an identification of a gateway port that is mapped to the replaced address. The gateway then serves the scrubbed Web page to the user client (Block 280).

(Emphasis Added).

However, the Web page described in paragraph [0051] of Webb is generated by the network device that has the content. In contrast, the Web page recited in claim 6 is dynamically generated by the gateway. Further, the content included in the Web page described in paragraph [0051] of Webb is located on the network device itself and is accessible via a Web server. In contrast, the Web page recited in claim 6 includes links to content on one or more devices on the home network, the content accessible to the gateway via a content protocol. Webb provides no indication that any links to content included in this Web page relate to content “accessible to the gateway via a content protocol,” as recited in claim 6. *Thus, the Web page described in paragraph [0051] of Webb is generated by a device that both has content and runs a Web server, while the Web page recited in claim 6 is generated by the gateway and provides access to content on the home network that may or may not be accessible via a Web server.*

Therefore, nowhere does Webb disclose or suggest a gateway that comprises at least one processor configured to “dynamically generate a Web page, the Web page including links to

content on one or more devices on the home network, the content accessible to the gateway via a content protocol, the Web page allowing the remote user to select only content or services that the remote user is authorized to select,” as recited in claim 6 as amended.

Saito relates to a relay device for communication of content-protected information. (Abstract). Saito is not cited in the Office Action as disclosing a Web page as recited in claim 6. Saito does mention a gateway that creates a home page for the remote controlling of the transmission node. (Col. 27, lines 52-54).

However, the home page described in Saito replicates control functions, such as a “playback” button, provided on the device from which content is being transmitted. (Col. 27, lines 61-67 through col. 28, lines 1-8). As understood, the home page mentioned in Saito relates to a particular device to which a user is already connected. Nowhere does Saito disclose or suggest that the home page includes links to content on one or more devices on the home network, as recited in claim 6. Further, nowhere does Saito disclose or suggest that the home page allows the remote user to select only content or services that the remote user is authorized to select, as recited in claim 6.

Therefore, even if one of skill in the art would have been motivated to combine Webb and Saito (which has not been established and which Applicants do not admit), this combination would not disclose all elements recited in claim 6 as amended.

Min is not cited as disclosing or suggesting any feature of an independent claim and, therefore, is not discussed herein.

All other independent claims have been amended to recite features similar to claim 6 and, therefore, are not obvious for at least the reasons set forth above. The dependent claims include all of the elements of the independent claims on which they are based and, therefore, are not obvious for at least the reasons set forth above. Accordingly, it is respectfully requested that the rejections of the pending claims under 35 U.S.C. § 103(a) be withdrawn.

Motivation to Combine and Inoperability

The purpose of Webb seems generally to be providing access to Web servers located on a private network. (Abstract). The gateway in Webb provides this access by redirecting “the received client request to the Web server” and scrubbing “a Web page served by a device Web server” before providing that Web page to the requester. Thus, as discussed herein, Webb is

clear that “Each of the devices connected to the private network 16 includes an on-board Web server that allows a user to perform various configuration, trouble-shooting, and/or administrative functions with respect to the device.” (§ [0043]). In contrast, Saito describes techniques for extending the copy protection defined only for the 1394 bus to communications with another network. (Col. 2, lines 7-20). However, the A/V devices mentioned in Saito do not seem to run Web servers.

Thus, it appears that the combination of Webb and Saito proposed in the Office Action would render Webb inoperable for its intended purpose, since the gateway described in Webb could not redirect a client request to a device that does not have a Web server. Further, the gateway described in Webb could not scrub a Web page received from a device that does not run a Web server, since such a device does not generate Web pages. Thus, the techniques described in Webb relating to providing access to network devices that each run a Web server would be inoperable if used in conjunction with devices that do not run Web servers. According to the MPEP, “If proposed modification would render the prior art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification.” (MPEP § 2143.01 V, citing *In re Gordon*, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984)). Therefore, it is respectfully submitted that one of skill in the art would not have been motivated to combine Webb and Saito.

Moreover, it is respectfully submitted that Saito is not analogous art. The Office Action states:

It would have been obvious to a person skill in the art at the time the invention was made to combine the teaching of Webb and Saito because the teaching of Saito would allow to provide a relay device and a communication device capable of realizing the contents protection procedure between devices that are not connected to the same network [Saito, col 2, lines 16-24].

(Page 5, lines 1-5).

Applicants’ attorney respectfully disagrees. Saito describes techniques for extending the copy protection defined only for the 1394 bus to communications with another network. (Col. 2, lines 7-20). The content protection described in Saito relates to preventing illegal copying,

which is addressed in communication over a 1394 bus by a content protection system. (Col. 1, lines 23-50). Thus, it is respectfully submitted that one of skill in the art would not have been motivated to combine Webb and Saito.

CONCLUSION

Applicants believe that all pending claims are allowable and respectfully request a Notice of Allowance for this application from the Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

The Commissioner is hereby authorized to charge any additional fees, including any extension fees, which may be required or credit any overpayment directly to the account of the undersigned, No. 50-4480 (Order No. CISC347).

Respectfully submitted,
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